

REMARKS

Claims 1-17, 21, 22, 24, 25, 30, 31 and 39-42 are presented for consideration, with Claims 1, 15, 21, 22, 24, 25, 30 and 31 being independent.

Selected claims have been amended to further distinguish Applicant's invention from the cited art and to better set forth the invention. In amending the claims, the typographical errors in Claims 16 and 30 have been corrected. In addition, Claims 39-42 have been added to provide an additional scope of protection. Claims 18, 19, 20, 23, 26-29 and 32 have been cancelled.

A new abstract is being submitted to better set forth technical aspects of the claimed invention.

Applicant is submitting concurrently herewith a Submission of Replacement Sheet of Drawings in response to the objection to the drawings on page 2 of the Office Action. In this regard, Figure 15 has been amended to change reference numeral "1502" to --1402--. Support for this change can be found, for example, on page 31, line 18 of the specification.

Claim 5 is rejected under 35 U.S.C. §112, second paragraph, as being indefinite. In response to this rejection, Claim 5 has been amended as shown above. It is submitted that Claim 5, as well as the other claims, are in full compliance with the particularity and distinctness requirements of the statute.

Claims 27-32 stand rejected under 35 U.S.C. §101 for allegedly being directed to non-statutory subject matter. As noted above, Claims 27-29 and 32 have been cancelled. Claims 30 and 31 have been amended to set forth a computer storage medium as suggested on page 4 of the

Office Action. Accordingly, reconsideration and withdrawal of the rejection under 35 U.S.C. §101 is respectfully requested.

Claims 1-32 stand rejected under 35 U.S.C. §102 as allegedly being anticipated by Adobe. This rejection is respectfully traversed.

Claim 1 of Applicant's invention relates to a method of representing an amount of image color in a composite image. The method includes the steps of generating at least one additional opacity channel for use in creating the composite image, and compositing at least one graphical object having object color and object capacity, with an image having image opacity and the image color, to create the composite image. The composite image has composite image color and composite image opacity, with the composite image color and composite image opacity being derived from one or more of the object color, the object opacity, the image color and the image opacity. As amended, Claim 1 includes the steps of compositing the object opacity with the additional opacity channel to create an updated opacity channel, with the updated opacity channel representing an amount of the image color remaining in the composite image following the compositing of the at least one graphical object with the image.

Support for the amendments to Claim 1 can be found, for example, on page 24, line 24, *et seq.*, of the specification. In accordance with Claim 1 of Applicant's invention, a high quality composite image can be provided.

With respect to Claim 1, the Adobe publication is relied on in the Office Action for teaching the steps of, among others, generating at least one opacity channel, and compositing the

opacity component values of at least one object with that of at least one opacity channel to produce an altered opacity channel.

It is respectfully submitted, however, that Adobe fails to teach or suggest, among other features, generating at least one additional opacity channel for use in creating the composite image, and compositing the object opacity with the additional passage channel to create an updated opacity channel, with the updated opacity channel representing an amount of the image color remaining in the composite image following the compositing of the at least one graphical object with the image. In regard to the compositing step, the Office Action asserts that Adobe teaches  $q_r$  as an altered opacity channel that represents opacity component values associated with the image remaining in the image following composition with the color and opacity components of at least one object, relying on page 423.

It is respectfully submitted, however, the  $q_r$  is defined in Table 7.5 of Adobe as the “Result Opacity,” which is understood to be the opacity of the final compositing image. The disclosed Result Opacity therefore is the expected result opacity for representing the final opacity of the composited image following a painting operation (see page 423, paragraph 1). It is submitted, therefore, that Adobe’s disclosed Result Opacity cannot be used to teach or suggest a compositing step that includes using an additional opacity channel representing an amount of the image color remaining in the composite image following the compositing of the at least one graphical object with the image. Adobe’s disclosed method would therefore provide the same results as conventional rendering systems of the type disclosed on page 5, line 19, *et. seq.*, of the subject specification.

It is submitted, therefore, that Adobe fails to teach or suggest at least the steps of generating at least one additional opacity channel and compositing the object opacity with the additional opacity channel to create an updated opacity channel as set forth in Claim 1 of Applicant's invention.

The remaining independent claims, i.e., Claims 15, 21, 22, 24, 25, 30 and 31, can also be distinguished over Adobe for at least the same reasons. These claims include use of an additional opacity channel and composite the object opacity with the additional opacity channel to create an updated opacity channel, with the updated opacity channel representing an amount of the original image color remaining in the composite image following the composite of the at least one graphical object with the image.

Accordingly, it is submitted that Adobe fails to anticipate or render obvious Applicant's invention as set forth in Applicant's claimed invention. Therefore, reconsideration and withdrawal of the rejection of the claims under 35 U.S.C. § 102(b) is respectfully requested.

Thus, it is submitted that Applicant's invention as set forth in independent Claims 1, 15, 21, 22, 24, 25, 30 and 31 is patentable over the cited art. In addition, dependent Claims 2-14, 16, 17 and 39-42 set forth additional features of Applicant's invention. Independent consideration of the dependent claims is respectfully requested.

In view of the foregoing, reconsideration and allowance of this application is deemed to be in order and such action is respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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